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July 1, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Lockheed Martin Corp. Petition for Rule Making, RM-10331

Dear Ms. Dortch:

Lockheed Martin Corporation ("Lockheed Martin") is the petitioner for rule making in RM-10331, Amendment of Parts 2 and 25 of the Commission's Rules to Allocate Spectrum for Government and Non-Government Use in the Radionavigation-Satellite Service. By this letter, Lockheed Martin comments upon the letter recently filed by The Boeing Company ("Boeing") in support of several requests made by Lockheed Martin in its aforementioned Petition. *See* Letter dated June 25, 2002, from John B. Hayhurst, President, Air Traffic Management, The Boeing Company, to Ed Thomas, Chief Engineer, Office of Engineering and Technology ("Boeing Letter").

Lockheed Martin filed its Petition on September 28, 2001. In the Petition, it urged the Commission expeditiously to commence a rulemaking proceeding to conform the Commission's Table of Frequency Allocations in Section 2.106 of the rules to the Final Acts of the 2000 World Radiocommunication Conference ("WRC-2000") in the area of frequency allocations and associated provisions for the Radionavigation-Satellite Service ("RNSS") in the 1164-1215 MHz and 1559-1610 MHz bands. *See* Lockheed Martin Petition at 11, et seq. WRC-2000 made new RNSS (space-to-Earth) and (space-to-space) allocations in the 1164-1215 MHz band, and added an RNSS (space-to-space) allocation to the existing RNSS (space-to-Earth) allocation in the 1559-1610 MHz band.

The Commission placed Lockheed Martin's Petition in RM-10331 on public notice on November 15, 2001 (*see* Public Notice, Report No. 2512, released November 15, 2001). No comments were filed in response to the public notice, by Boeing or anyone else. Earlier this year, Lockheed Martin was given to understand that its Petition concerning the implementation of the Final Acts of WRC-2000 for the RNSS allocations in the 1.1-1.6 GHz range would be folded into the forthcoming notice of proposed rulemaking in a larger proceeding that will address implementation of a number of allocation actions in the 3-30 GHz range that were taken by WRC-2000. Lockheed Martin is hopeful that the Commission will issue a notice of proposed rule making in this proceeding before the end of the current fiscal year.

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The Boeing Letter, though filed well outside the established pleading cycle for RM-10331, is nevertheless welcomed by Lockheed Martin. Boeing essentially supports the request regarding the spectrum allocation and ancillary matters in the 1164-1215 MHz band made by Lockheed Martin in its petition last year. Unlike the Lockheed Martin Petition, however, the Boeing Letter did not address the addition of the RNSS (space-to-space) allocation for the 1559-1610 MHz band. In treating the Boeing Letter, the Commission should not overlook Lockheed Martin's proposal for this allocation or its discussion of the RNSS band at 1215-1300 MHz.

One cautionary note needs to be sounded, however. As Boeing's Letter requests the Commission to initiate a rulemaking proceeding, but its comments fall entirely within the envelope of the specific rule proposals and detailed supporting rationale Lockheed Martin advanced in its own Petition, the Commission should not delay its processing of the omnibus WRC-2000 implementation proceeding on which the Commission is understood to be nearing completion to work on a separate notice of proposed rule making.

Again, Lockheed Martin welcomes the support that Boeing has provided for several proposals in Lockheed Martin's Petition for Rule Making (RM-10331), and it urges the Commission to expedite its consideration of proposals to implement the RNSS aspects from the Final Acts of WRC-2000.

Respectfully yours,

A handwritten signature in dark ink, appearing to read "Jennifer Warren", with a small circular mark at the end.

Jennifer A. Warren
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Lockheed Martin Corporation

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cc: Ed Thomas, Chief Engineer, OET
John B. Hayhurst, The Boeing Company